

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13

James Joseph Conaway : Case No. 20-12378-AMC

Debtor(s)

ANSWER TO MOTION OF RELIEF FROM THE AUTOMATIC STAY OF  
Rocket Mortgage, LLC f/k/a Quicken Loans, LLC  
f/k/a Quicken Loans Inc.  
AND CERTIFICATE OF SERVICE

Counsel has been informed that the Debtor is recently  
deceased and is requesting that the current payoff to be supplied  
as Debtor had wanted to sell the property.

WHEREFORE, Debtor respectfully requests this Honorable Court  
deny Movant's Motion for Relief from Automatic Stay.

/s/ David M. Offen  
David M. Offen Esquire  
Attorney for Debtor

Dated: October 26, 2023

A copy of this Answer is being served on MARK A. CRONIN,  
Esquire and the Chapter 13 Trustee.